

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2015-75-C

Re: Application of RCLEC, Incorporated )	
for a Certificate of Public )	
Convenience and Necessity to )	
Provide Local Exchange and Resold )	<b>PETITION TO INTERVENE</b>
Long Distance Telecommunications )	
Services and for Flexible Regulation )	
of Its Local Exchange Services and )	
Alternative Regulation of Its Long )	
Distance Offerings )	
_____ )	

In response to the Commission's Notice of Filing of the Application of RCLEC, Incorporated ("RCLEC") for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800  
[jbowen@mcnair.net](mailto:jbowen@mcnair.net)  
[pfox@mcnair.net](mailto:pfox@mcnair.net)

By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

March 11, 2015

Columbia, South Carolina

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2015-75-C

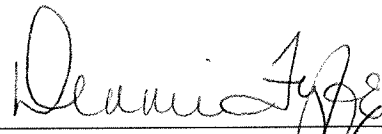
Re: Application of RCLEC, Incorporated )  
for a Certificate of Public )  
Convenience and Necessity to )  
Provide Local Exchange and Resold )  
Long Distance Telecommunications )  
Services and for Flexible Regulation )  
of Its Local Exchange Services and )  
Alternative Regulation of Its Long )  
Distance Offerings )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

I, Dennie Fyfe, do hereby certify that I have this date served one (1) copy of the foregoing  
Petition to Intervene upon the following parties of record by causing said copies to be deposited in  
the United States Mail, First Class, postage prepaid to:

Bonnie D. Shealey, Esquire  
Robinson McFadden & Moore, P.C.  
P.O. Box 944  
Columbia, SC 29202

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201



\_\_\_\_\_  
Dennie Fyfe, Legal Assistant  
McNair Law Firm, P. A.  
Post Office Box 11390  
Columbia, South Carolina 29211

March 10, 2015

Columbia, South Carolina